

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

People of the State of California, et al. v. Meta Platforms, Inc., et al.

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**[PROPOSED] ORDER RESOLVING
JOINT LETTER BRIEF REGARDING
META'S RULE 30(B)(6) DEPOSITIONS
OF COPPA-ONLY STATES**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

On March 17, 2025, the COPPA States¹ and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (“Meta,” and together with the COPPA States, the “Parties”) submitted a Joint Letter Brief setting forth their positions on disputes concerning

¹ The “COPPA States” refer to Arizona, Hawai’i, Idaho, Maine, Maryland, Ohio, Rhode Island, South Dakota, Washington, and West Virginia. Four of these states never asserted state consumer protection claims (Idaho, Maryland, South Dakota, and West Virginia), and six are currently in the process of negotiating a stipulation with Meta to dismiss their state consumer protection claims with prejudice (Arizona, Hawaii, Ohio, Maine, Rhode Island, and Washington), leaving only COPPA claims (Count I of the Complaint) against Meta. Paragraph 1 of this Order shall not apply to any COPPA State that either does not dismiss its consumer protection claim(s) against Meta with prejudice, or seeks to assert any consumer protection claims against Meta in any way.

1 Meta's Amended Rule 30(b)(6) Deposition Notices to the COPPA States. ECF 1770. On March 20, 2025,
2 during a Discovery Management Conference ("DMC"), the Court heard oral argument on the issues
3 outlined in the Parties' Joint Letter Brief.

4 Having reviewed the Joint Letter Brief and having heard the arguments of the Parties, and as stated
5 on the record during the DMC, the Court **ORDERS** as follows:

6 1. With respect to the COPPA States, the following topics contained in Meta's
7 Amended Notice of Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6) ("Amended
8 Notice") shall be modified as reflected below:

9 a. Topic 1:

10 i. Strike the phrase "(including without limitation to employees of the State
11 and its agencies)"

12 ii. Replace "Social Media Platforms" with "Instagram and/or Facebook".

13 b. Topic 2 is struck.

14 c. Topic 3:

15 i. Strike the phrase "(including without limitation any State agency)"

16 ii. Replace "Social Media Platforms" with "Instagram and/or Facebook".

17 d. Topic 4: Replace "Social Media Platforms" with "Instagram and/or Facebook".

18 e. Topic 5 is struck.

19 f. Topic 6:

20 i. Strike "communications and/or"

21 ii. Insert "identified" between "or" and "potential program"

22 iii. Replace "Social Media Platforms" with "Instagram and/or Facebook".

23 g. Topic 10:

24 i. Strike "or non-public"

25 ii. Replace "Social Media Platforms" with "Instagram and/or Facebook".

26 h. Topic 13 is struck without prejudice. Each State will direct Meta's counsel to
27 publicly available documents or produce any documents that are not publicly
28 available from the Relevant Period showing the State's employee pension plan

1 investments in Meta, Facebook, and/or Instagram, and tax incentives or tax benefits
2 provided to Meta, Facebook and/or Instagram to the extent that any such
3 investment, incentive or benefit exists. The States shall not object to the
4 authenticity of such documents produced by the States or identified from the public
5 sources by the States. Meta reserves all rights with respect to any State that does
6 not comply with its obligations under this subparagraph, including (without
7 limitation) Meta's right to re-notice Topic 13.

8 i. Topic 25 is struck without prejudice.

9 j. Topic 31

10 i. Limit the time period to the Relevant Period (as the term is defined in
11 Meta's Amended Notice).

12 ii. Replace "Social Media Platforms" with "Meta Social Media Platforms
13 (limited to Instagram and/or Facebook)".

14 2. This RESOLVES Dkt 1770.

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16
17 **IT IS SO ORDERED.**

18 DATED: April 14, 2025



19 Hon. Peter H. Kang
20 United States Magistrate Judge